

ATTACHMENT 10

UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE

In Re: W.R. GRACE & CO., et al.,)	CHAPTER 11
)	
)	BANKRUPTCY NO. 01-01139 (JKF)
DEBTORS.)	(Jointly Administered)
)	
)	Objection Deadline: April 4, 2008
)	Hearing Date: April 21, 2008

**DECLARATION OF DARRELL W. SCOTT IN SUPPORT OF
ZAI CLAIMANTS' RESPONSE TO DEBTORS' MOTION FOR BAR DATE**


DARRELL W. SCOTT makes the following declaration:

1. My name is Darrell W. Scott. I am over the age of 18 and am competent to testify in Court. I am co-special ZAI counsel with respect to ZAI Science Trial; attorney for Washington Class Representatives Marco Barbanti and Ralph Busch, Class Counsel in the pending certified class action *Barbanti v. Grace et al.*

2. Attached hereto as Exhibit A is a true and correct copy of a news article authored by Andrew Schneider entitled *Uncivil Action: A Town Left to Die*, Seattle Post-Intelligencer, November 18, 1999.

3. Attached hereto as Exhibit B is a true and correct copy of exemplars of Zonolite packaging and marketing materials for Zonolite Attic Insulation.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct and that this Declaration was executed this 8th day of April, 2008, in Spokane, Washington.



DARRELL W. SCOTT

EXHIBIT A

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ARCHIVES

UNCIVIL ACTION: A TOWN LEFT TO DIE

By ANDREW SCHNEIDER P-I SENIOR NATIONAL CORRESPONDENT

Thursday, November 18, 1999

Section: News, Page: A1

First, it killed some miners.

Then it killed wives and children, slipping into their homes on the dusty clothing of hard-working men.

Now the mine is closed, but in Libby, the killing goes on.

The W. R. Grace Co. knew, from the time it bought the Zonolite vermiculite mine in 1963, why the people in Libby were dying.

But for the 30 years it owned the mine, the company did not stop it.

Neither did the governments.

Not the town of Libby, not Lincoln County. Not the state of Montana, not federal mining, health and environmental agencies, not anyone else charged with protecting the public health.

The story of Libby, Mont., is the story of the monumental, even unforgivable, failure of government at all levels to protect its people from corporate misdeeds that at best were neglectful and insensitive and at worst were dishonest, immoral and criminal.

Here is what is killing people in Libby:

Along with the enormous deposits of vermiculite in the earth of nearby Zonolite Mountain are millions of tons of tremolite, a rare and exceedingly toxic form of asbestos.

For eons, the tremolite lay undisturbed and harmless beneath a thin crust of topsoil. < But mining the vermiculite has released the deadly asbestos fibers into the air.


A Post-Intelligencer investigation has shown that at least 192 people have died from the asbestos in the mine's vermiculite ore, and doctors say the toll could be much higher. The doctors and Libby's long-suffering families say that at least another 375 people have been diagnosed with fatal diseases caused by this silent and invisible killer.

Dr. Alan Whitehouse, a lung specialist from Spokane and an expert in industrial diseases, said another 12 to 15 people from Libby are being diagnosed with the diseases -- asbestosis, mesothelioma, lung cancer -- every month.


It takes anywhere from 10 to 40 years from the time a person is exposed to dangerous amounts of asbestos for the diseases to reveal themselves.

So in Libby, the dying goes on.

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David Horsey
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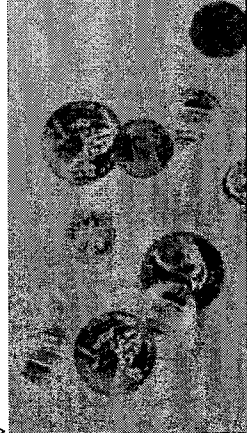
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Grace defends its actions.

The W.R. Grace Co. says it did no harm.

"Obviously we feel we met our obligation to our workers and to the community," said Jay Hughes, Grace's senior litigation counsel. Hughes said Grace spent "millions" to upgrade safety conditions and reduce dust at the mine.

But since 1984, 187 civil actions have been filed against Grace on behalf of Libby's miners and their families. There are 120 cases pending. In the others, Grace has either been found liable and been ordered to pay damages in a jury trial, or it settled out of court, often shortly before the trial was to begin. Scores of new suits are expected as more former workers, their families and other Libby residents are diagnosed with cancer and other asbestos-spawned diseases.

The district court in Libby is permitting only one civil action against Grace every three months.

The diseases do their work slowly, but not that slowly. Long before they get their day in court, many more victims will die.

A family's nightmare

Throughout Lincoln County are families torn apart by asbestos, but none has paid a higher price than the Bundrocks. Six of the family's seven members have been diagnosed with asbestos-related disease.

Arthur Bundrock worked at the mine for 19 years. He died last summer on the front lawn of his house, having left his oxygen bottle inside.

"He hated being tied to that green bottle. It let him live, but took his freedom. He'd always sneak off without it," said his widow, Helen.

Arthur Bundrock suffered for 21 years. His pain was not just from the disease, but from the knowledge that the white, talc-like dust he carried home from the mine every day had attacked the lungs of all of his family but one.

"I've got it," said Helen, "and so do Donna, Robin, Mary and Bill. Only my youngest, Cindy, hasn't been diagnosed with it, and we're all praying for her." As one after another of his family became sick, Art's pain grew worse.

"It was like tearing his heart out piece by piece," Helen said. "He never quit crying for two weeks when I found out that I had it. And with the children, he just couldn't be consoled." She said that managers at the mine told miners the dust was harmless -- a claim echoed by other miners and denied by W.R. Grace.

"They lied, but they did worse than that," she said, talking about when her son, now 46, went to work for Grace.

"Bill had to get a chest X-ray before they hired him. That X-ray showed he had asbestosis and they never told him. They just let him go to work up there with all that poison. They never told him for the 10 years he worked there." Helen Bundrock said she's fighting it as her husband did.

"I know what's in store for me and my children, but I keep at it. I force myself to walk the two blocks to the post office. I can't give in."

But she's worried about the future of others.

"Where I live is not far where they processed that stuff and the sparkles (from the vermiculite) are all over the place," she said.

"Lots of kids play around here. I hope they won't be the next generation to suffer." Huge amounts of asbestos



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West of Libby, the Cabinet Mountains rise more than 8,000 feet, providing a beautiful and dramatic backdrop to the town of 2,700. Three miles east, as the winds blow, is a smaller mountain, Zonolite Mountain, the life-and-death mountain. Life, because more than 1,900 men and women earned their living at the mine. Death, because of the way the mine was operated. Death, because of the tremolite. The mine and mill processed an astonishing amount of asbestos.

According to W.R. Grace records and court documents, nearly 300,000 pounds of asbestos a day went through the ``dry mill," the primary ore-processing facility and the dustiest building on the property. By 1975, Grace had built a new mill and production had doubled, which means more than half a million pounds of asbestos a day were processed.

Tests in 1969 showed that 24,000 pounds of dust a day were expelled from the large stack on the dry mill. The dust was about 20 percent asbestos, and had tested as high as 40 per cent. So even at 1969 production levels, at least 5,000 pounds of asbestos a day were spewed from the dry mill stack. And there were several other stacks in operation as well.

Dust from the stacks blanketed the nearby mine buildings, where most of the workers were, and much of the mountainside. It did not have to snow for Zonolite Mountain to be white.

Some days, when the east wind blew, sheets on the clotheslines of Libby would be covered in the dust, and children would write their names in the dust on their parents' cars.

Whitehouse, the Spokane doctor, specializes in lung cancers, pneumonia and industrial diseases that affect the lungs. His background is extensive and varied, and includes working for NASA, where he ran a pulmonary laboratory for the Apollo moon-landing project.

Almost every doctor in and around Libby has sent patients the 180 miles to Whitehouse. He has evaluated and/or treated more than 200 of them for various diseases caused by exposure to tremolite. More Libby patients suffering from asbestos-related disease are being treated by other doctors in Spokane, as well as in Kalispell, Boise, Portland, Salt Lake City and Seattle.

None of the ways of dying from asbestos is easy, or pretty.

The main illnesses caused by airborne asbestos are mesothelioma, or cancer of the pleural lining of the lung; cancer of the lung itself; and asbestosis, a thickening and scarring of the lungs.

The microscopic asbestos fibers are so small they hang suspended in the air for extended periods. When inhaled, they can penetrate, then irritate the lung. The lung cannot remove an asbestos fiber that has speared into its tissue. It cannot be coughed out or washed out of the tissue by blood. So the area around the fiber becomes inflamed, and eventually the site becomes scarred.

Over a period of years it becomes impossible to take a deep breath.< The tissue changes from the elasticity and thickness of a balloon to that of a thick orange peel. When breathing is restricted, oxygen cannot get into the lungs and carbon dioxide and other impurities cannot get out.

The pain of death by asbestosis is no secret in this town.

``We've all had family and friends die and we watched and held them," Gayla Benefield said. ``The heart is the last organ to go, so they're alive until the end, until the fluids fill their lungs and they suffocate."

Sharply pointed fibers

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Whitehouse has seen many examples of asbestos disease, but he says the Libby cases are different.

Unlike the fibers of other types of asbestos, tremolite's fibers are needle-like and sharply pointed and therefore penetrate the lining of the lungs more easily, he said.

Of the various types of asbestos, tremolite is considered by many researchers to be the most carcinogenic.

In the early days, when the miners and their families complained to their Libby doctors of respiratory problems, even when they coughed up blood, they were often told they had bronchitis, or asthma or the flu. Many say Whitehouse was the first to tell them the real nature of their diseases.

Because of the latency period -- the time from the inhalation of fibers to the onset of disease -- Whitehouse said that people exposed to asbestos before the mine closed in 1990 will be dying for decades to come. Also, he said, studies have shown that fibers can remain in a house for 15 years after being brought in on dusty clothing.

``We may be seeing this until the year 2030," he said.

``There are my folks'

The frost-covered brown grass crunches under Gayla's feet as she walks slowly through wisps of fog at the Libby Cemetery. She goes to the graveyard every Wednesday, because it holds so many of her friends and family.

``There are my folks," she said, pointing to the markers engraved with the names Perley Vatland and Margaret Vatland. ``Dad was 62 and mom was 76. The mine killed them both." She looks up from the graves and stares into the middle distance, remembering. ``Dad came home covered in white dust and it was all over the place. Mom was a fanatic about keeping the house clean. She bought the newest Kirby vacuum but it would just suck in the fibers but blow them right into the air. The filters couldn't stop them. Not at all." She points to the next row of markers.

``Butch and John worked up there and they both died of lung cancer. Gladys was a secretary at the mine. The dust got her, too."

Behind her was another row of granite slabs, commemorating more workers at Zonolite Mountain. More lay in the next row, and the next.

``Look at the old men in this town," she said. ``The loggers may be banged up and bent over but they're still alive."< Gayla Benefield sued W.R. Grace for the death of her mother, and won a damage award. She could not sue on her father's behalf because his illness had been covered by workers' compensation.

``It bothered me that we couldn't make the company accountable for killing my father. They knew there was asbestos in that dust. Grace's files are filled with hundreds of studies and reports of the dangers and as many letters to and from Grace's headquarters about what they should do about it. But they did nothing but cover it up," she said.

Grace acknowledged at trial that Gayla's mother had died because of exposure to asbestos from the mine. The company lawyer said the company was ``very sorry."

In defending itself in cases involving Margaret Vatland's death and the deaths of other miners' wives and children, Grace's lawyers told juries that until 1973, neither state nor federal inspectors had ever told them there was a danger to their employees' families. In 1973, the lawyers recalled, a U.S. Bureau of Mines inspector told the company, ``You should put some changing rooms in so that people going home don't expose their families."

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"I watched that dust kill my mother," Gayla said. She was "a strong, independent woman who always took care of herself, tied to a green oxygen tank, too weak to walk 20 feet, dying the most painful death imaginable. And now I'm worried about the same thing happening to my kids."

Her personal battle with Grace over, Gayla has become a persistent, solitary voice pushing for people, especially the government, to look at her town, to study what happened to the miners and their families, and to examine what's happening today.

"Some people here just want me to let it all die," Gayla says. "But that's what it's all about, people dying. I just want someone to make sure that the next generation doesn't die of the same thing that killed their parents and grandparents."

First link in 1900

Asbestos has been used for centuries, but it wasn't until 1900 that a physician first linked the fiber to the death of a patient. A London physician conducted an autopsy on a 34-year-old patient who slowly lost the ability to breathe and eventually suffocated. The doctor found massive scarring and asbestos fibers embedded in the man's lungs. The patient had worked for 16 years in a factory that made textiles from asbestos.

In 1924, the same year the Zonolite mine began operation, the British Medical Journal published its first study naming asbestos as a cause of death.

In the mid-30s, pathologists at Presbyterian-University Hospital in Pittsburgh reported finding asbestos in the lungs of 46 of 100 asbestos factory workers they had autopsied.

Dr. Irving Selikoff, who headed the Environmental Science Laboratory at New York's Mount Sinai Hospital, is considered the father of asbestos health research in the United States. He reconfirmed the hazards of the fiber in 1964, when he published his studies into the deaths of hundreds of asbestos workers in the '40s, '50s and '60s.

Meanwhile, production at the Zonolite mine was surging.

To trace the mine's effect on Libby, the P-I examined 6,000 pages of company documents, medical records, federal and state inspections and interviewed more than 110 safety, health and environmental investigators, former employees and their families or survivors.

In 1956, the Montana Board of Health, Division of Disease Control, inspected the plant and found that "asbestos dust in the air is of considerable toxicity." Investigators found enormous quantities of dust and inoperative exhaust systems" and called for broad improvements.

Two and a half years later, the health board followed up to "determine if any of the components . . . found to be detrimental to the health of the employees in August 1956 had been reduced or alleviated." The inspectors listed deficiencies on four single-spaced pages, detailing areas where high concentrations of asbestos-laden dust spewed from the pipes, chutes and machinery.

They repeated a warning they had made in 1956: "Inhalation of asbestos dust must be expected sooner or later to produce pulmonary fibrosis . . . pulmonary asbestosis, once established, is a progressive disease with a bad prognosis."

Sure enough, workers were beginning to experience respiratory problems.

The first miner to be diagnosed with asbestosis was Glenn Taylor. In February 1959, after 19 years of working at the mine, doctors at the state tuberculosis hospital determined that the disease that was robbing Taylor's ability to breathe was not TB, but asbestosis.

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Despite Taylor's case and the ones that followed, many of the mine's workers maintain that Grace waited at least 15 years before it conceded that there was anything hazardous in the dust that often covered them.

'Of course they knew'

In its defense before various juries, Grace has maintained that it and the Zonolite Co. < before it, was using the latest safety and health information available to the industry.

Yet, even before Grace bought the mine, more than a dozen reports by the Montana Health Department and the U.S. Bureau of Mines cited the high concentrations of asbestos in the vermiculite dust blanketing the operation. The 1956 state report warning of the asbestos dust's ``considerable toxicity" is a prime example.

``Of course they knew there was asbestos up there," said Les Skramstad, who worked at the mine for two years and is dying of cancer from the fibers. ``They used to have us drive up to the mine and fill up our pickup truck with piles of raw asbestos off the mine face. We'd bring it back to town, where the researchers would experiment with it, trying to find something they could make out of it to sell.<" A 1969 internal report, directed to the desk of company President Peter Grace, warned that ``tremolite is definitely a health hazard.<" Hughes, the W.R. Grace senior attorney, said the company monitored the health of its workers ever since it bought the mine in 1963.

Dr. William Little, a radiologist who did the first chest X-rays of the workers in 1964, found a ``great deal of lung abnormalities among the employees . . . far in excess of what one would find in examining the normal population."

Little said the situation was ``even more severe when considering he was examining young, hardy workmen." Hughes said the X-ray results were sent to the miners' family doctors.

Dozens of workers and their survivors acknowledged in P-I interviews that the X-rays were taken. But all said that they were never told the results.

Grace correspondence from November 1967 said: ``The only persons aware of the studies are (Grace) officials and Dr. Little."

The number of workers with lung abnormalities was frightening to some of the doctors involved.

A 1969 series of X-rays showed that almost half of the people who had worked at the mine for 11 to 20 years had lung disease of some type. Among the employees who had worked at the mine for 21 to 25 years, 92 percent were diseased.

Even Grace's insurance company cautioned Grace about not moving quickly enough to inform workers of the health problems the company's medical surveillance detected.

``Certainly when an X-ray picture shows a change for the worse, that person must be told," said a December 1969 letter from Maryland Casualty Co. ``Failure to do so is not humane and is in direct violation of federal law.<" Not permanent solutions

Hughes, the Grace attorney, emphasized that the company's issuance of respirators to workers was more evidence that the company was taking the health threat seriously.

Again, Grace documents showed a different side of the issue.

``Respirators or other respiratory protective devices should not be considered as permanent solutions to any processing procedures which create contamination of the atmosphere," a Grace safety officer wrote in January 1965.

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At least six state and federal inspection reports in the '60s and '70s raised the same concerns.

"We did have respirators, but the dust was so heavy most of the time that they clogged up within minutes," recalls Skramstad. "You had a choice of wearing them or breathing." Leroy Thom, the last union president before the closing, agrees. "If you had a respirator on . . . pretty soon it was clogged up, so you just took it off."

Hughes said the company worked closely with the workers' union on safety issues, especially the high levels of dust. Thom remembers it differently. "We did have discussions on the dust. But the story was always the same: 'It's just a nuisance dust. It's not a problem.' But (for years) the company never told us it contained asbestos, or anything dangerous."

"Eventually, they told us that the dust contained tremolite, not asbestos, and that tremolite was not hazardous," said Thom, who worked at the plant from 1974 to 1992 and was a union officer for 12 years.

"It wasn't until 1979 that Grace admitted to us that tremolite was a serious health threat." Reports stamped "confidential"

The documents collected by the P-I also raise questions about the role of the federal health investigators. At times it becomes difficult to determine whether they were trying to protect the workers or the company.

For example, in 1969, the U.S. Public Health Service asked that Grace provide data for a mortality study of asbestos workers. The author of the letter, the epidemiology director of the Bureau of Occupational Safety and Health, promised that the "data would only be published if no significant differences with Montana death rates were shown."

All of the state inspection reports, four a year, from the Montana health department, were stamped "confidential" and said they were "not for distribution except to the management" of the company.

In internal memos, Grace lawyers said the confidentiality would protect them from having the state reports used against them in workers' compensation cases.

The promise of confidentiality was the only way that state inspectors could get into many industries at the time, according to a Montana state employee who has researched the state's environmental history.

Even though the language in some of the reports showed increasing frustration at the company's slow pace in getting the lethal dust under control, there is not a single indication that government inspectors ever threatened or even considered shutting the plant down.

A 1964 letter from Benjamin Wake of the Montana Board of Health Division of Disease Control to Arthur Bundrock, then the union secretary at the mine, offers some insight.

"The enforcement provisions of the Industrial Hygiene Act . . . are very poor and various opinions, over the years, from the attorney general's office have not strengthened the act," Wake wrote.

The U.S. Bureau of Mines was dismantled in the early 1990s, but three former inspectors interviewed by the P-I agreed that the political clout of the mining companies and their lobbyists, especially in Western states, made taking strong actions against offending mines almost impossible.

"You would have to have bodies stacked like cordwood and the public screaming for someone's head before we could get the government's lawyers to do anything," said Robert Jones, a former Bureau of Mines inspector from Denver.

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Other federal agencies, as far away as Washington, D.C., knew there were problems in Libby.

In 1969, a deputy U.S. attorney general who owned a cabin near Libby blew the whistle. He reported to the Public Health Service that ``there is a dust problem at Libby . . . affecting workers and the community."

A 1982 EPA investigation into asbestos-contaminated vermiculite documented that significant levels of asbestos fibers were captured by air samplers in downtown Libby.

Questioned last week, health experts at the EPA and the U.S. Public Health Service said they could find no indication that any formal actions were taken or demands made to Grace while the mine was operating about the asbestos conditions plaguing the workers.

The spread of the asbestos to the miners' families could have been halted in most cases by the simple installation of showers. The request for showers went back long before Grace bought the mine. The workers and their union often repeated the request.

Even the federal government weighed in, but it didn't follow through.

An April 1973 U.S. Bureau of Mines report reminded Grace that most employees wear their clothes to and from work and told the company it needed showers so the workers could change out of their dust-covered clothes.

In 1975, when Grace opened a new, less dusty wet-process mill, it had a shower room _ two showers for at least 60 men per shift.

Workers wanted more, and they kept asking. In a February 1978 memo, Grace promised workers that ``there are plans for 1978 for the installation of proper shower facilities for all employees." But no agency ever forced Grace to build those additional showers, and the company never did so.

John Wardell, the current coordinator of EPA's operation in Montana, said there's a limit to what the government is responsible for.

``We are not responsible if the workers went home before being properly decontaminated and brought asbestos into their homes. That's a personal issue."

'Keep them on the job'

Early in its ownership of the mine, Grace sought ways to minimize its financial obligation to asbestos victims. In an internal memo marked ``personal and confidential" written Jan. 5, 1968, Grace's safety chief, Peter Kostic, suggested reassigning 32 Libby workers whose X-rays showed disease to less dusty jobs. ``If we minimize their exposure to dust . . . chances are we may be able to keep them on the job until they retire, thus precluding the high cost of total disability," Kostic wrote.

In a March 1969 internal memo, another Grace executive wrote, ``The inclination of public agencies to protect the worker at any expense (usually the employer's) . . . should be of considerable concern to us. Our recent experience at Libby . . . may well create a significant financial liability. We should also be concerned with the obligation to our employees; namely, permitting them to perform their services under working conditions which we have good reason to believe are hazardous."

Grace's insurance carrier, Maryland Casualty Co. in Portland, Ore., had told Grace two years earlier that its ``inability" to curb the asbestos contamination despite repeated warnings ``through the years might be alleged at least to have constituted willful and wanton conduct . . . "

The insurer also urged Grace lawyers to prevent the entry of the

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``confidential" state inspection reports into evidence in a workers' compensation case. The insurance company cautioned Grace to ``keep them out of the hands of the Industrial Accident Board and through it, the general public."

Libby's rough-hewn roots

The Kootenai River, after flowing south from Canada, turns west on its way to the Columbia.< There at the bend, settlers, miners, trappers and railroaders built the town in 1892, on the Great Northern Railroad right of way.

Libby is proud of its rough-hewn roots.< On the grounds of the town's Heritage Museum are an old loggers' cookhouse and a miner's cabin, meticulously decorated by the Libby Women's Club.

Today, like many Western towns, Libby is being forced to shift its economy from those extractive industries, and the town is trying hard to capture its share of new, supposedly healthier, sources of income. Kootenai Falls was featured in the film ``The River Wild," and the Chamber of Commerce is unabashedly and successfully wooing tourists looking for outdoor adventure.

But much of the old remains: the well-worn frame houses on tree-shaded streets, the old German Lutheran church, now fashioned into the remarkable Hidden Chapel Restaurant _ and a persistent pro-mining attitude.

Some townspeople think too much is being made of the deaths and illness. Some of the families who have sued W.R. Grace have been ostracized by their neighbors.< When the film ``A Civil Action," a true story about a lawyer for families who sued W.R. Grace, played at the Dome Theatre, attendance was sparse.

``The environmental politics of the nation don't always go over well in small towns," Libby Mayor Tony Berget said.< ``The environmental laws have hurt the logging industry, and that has cost us a lot of jobs. Add that to Grace closing the vermiculite mine and it's been a rough 10 years for a lot of our people. Our unemployment is between 14 and 16 per cent.<" ``Libby is a very trusting community and we trusted the company," Leroy Thom said. ``We never considered they would do anything that would harm their own employees.

``We were wrong."

Tomorrow: Libby may still be at risk.

-- P-I senior national correspondent Andrew Schneider can be reached at 206-448-8218 or andrewschneider@seattle-pi.

This article contained at least one photo or illustration as described below:

Type: Color Photos, Map and Drawing

Description: PHOTOS BY GILBERT W. ARIAS -- P-I PHOTOGRAPHER:

- (1) Les Skramstad, who is dying of asbestosis, picks up pieces of vermiculite on a mound of dirt at an old ball field near Libby, Mont. Skramstad worked in a Vermiculite mine operated by W.R. Grace Co. The mining process released tremolite asbestos into the air. Skramstad's wife and two of his children also have the fatal disease.
- (2) The U.S. flag flies over Libby's main street. Asbestos from the town's nowpclosed mine has killed at least 192 people.
- (3) Gayla Benefield visits the graves of her parents at the cemetary in Libby. Her father worked in the vermiculite mine and died from asbestosis. Her mother did not work at the mine, but family members believed to be affected by the asbestos brought home in the miners' dusty clothes.
- (3) Arthur Bundrock and his wife, Helen, foreground, and their children Cindy, left, Robin, Bill, Mary and Donna. Arthur died of asbestosis; Helen has the diseas and so do all of the children except Cindy.
- (4) The snow-covered Cabinet Mountains form the backdrop for the now-closed W. R. Grace vermiculite mine Zonolite Mountain three miles east Libby. The Kootenai River can been seen in center of the photo.
- (5) Libby

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(6) Dangers of asbestos exposure

(7) Know deaths from tremolite from the Libby mine.

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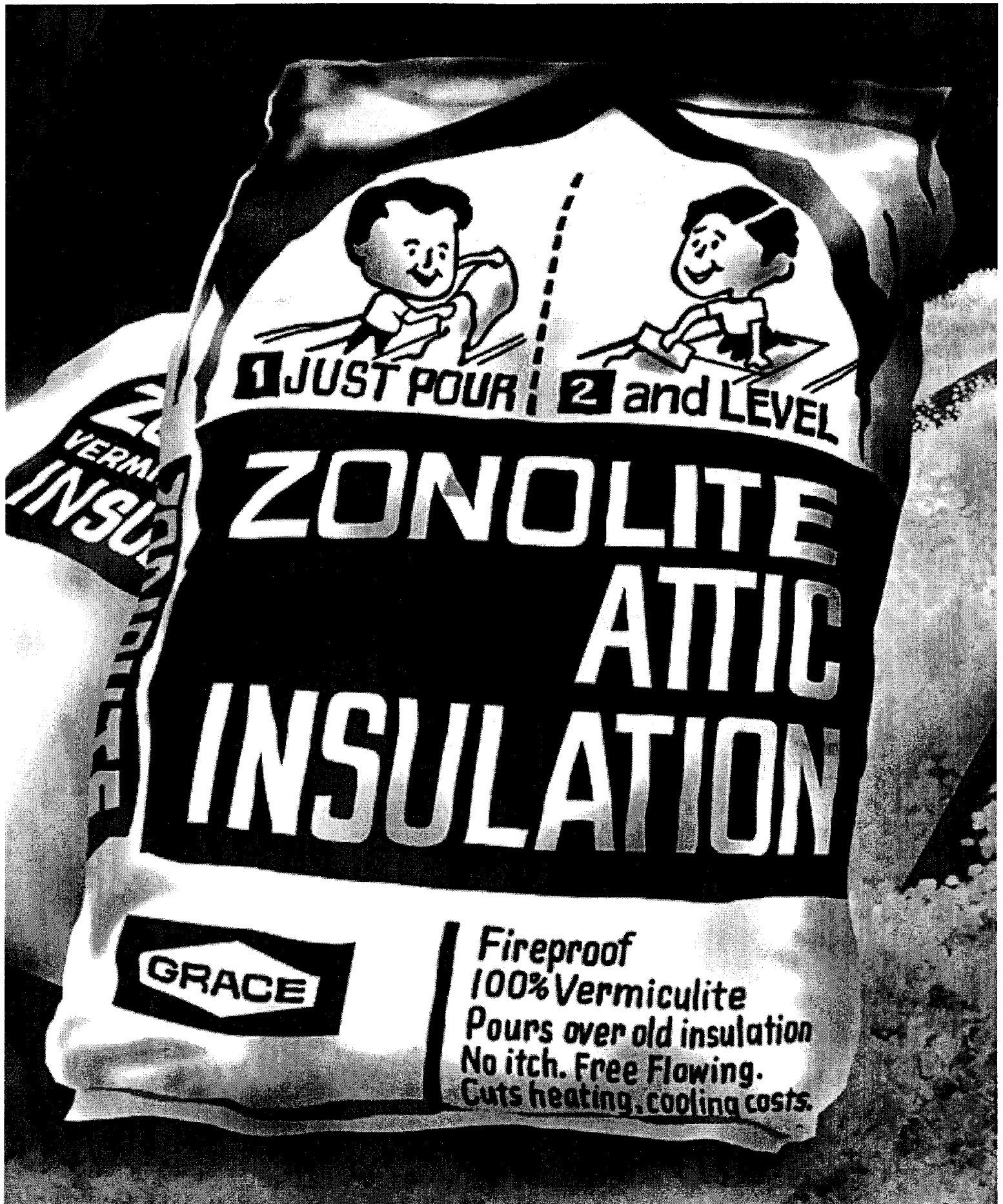
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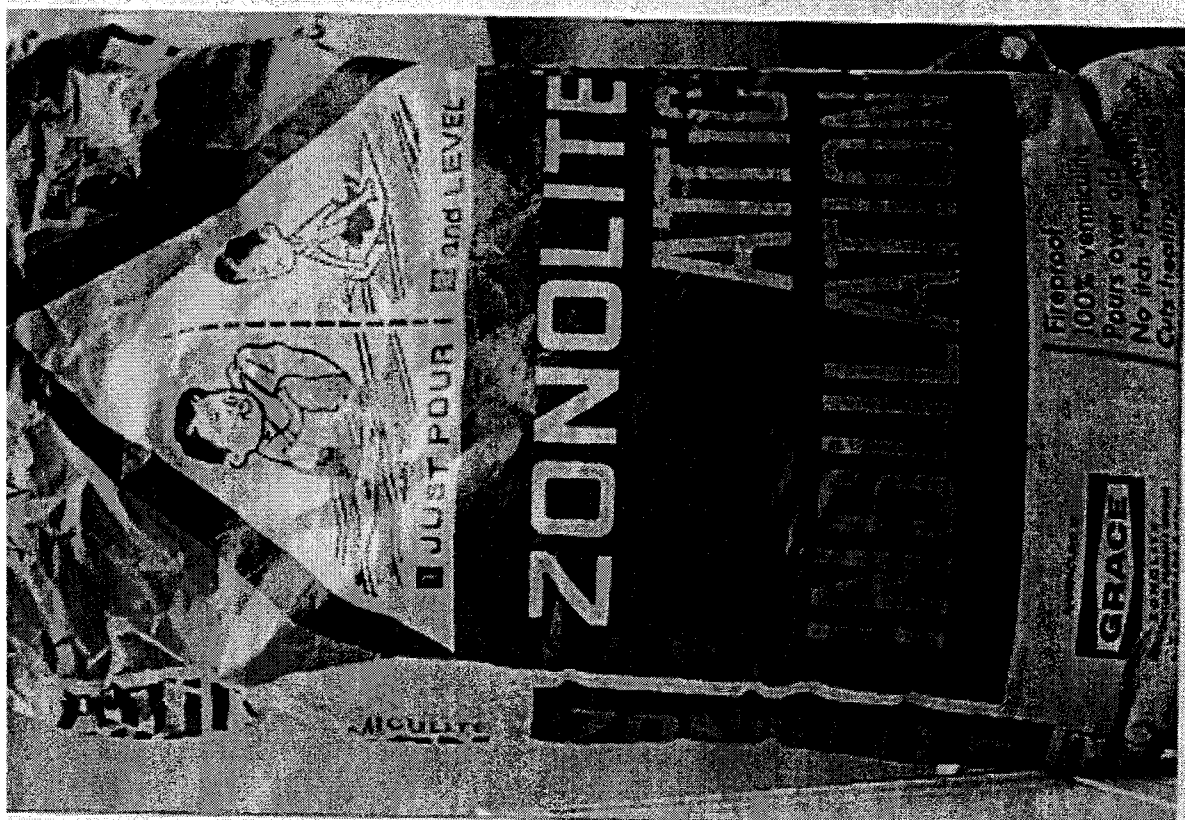
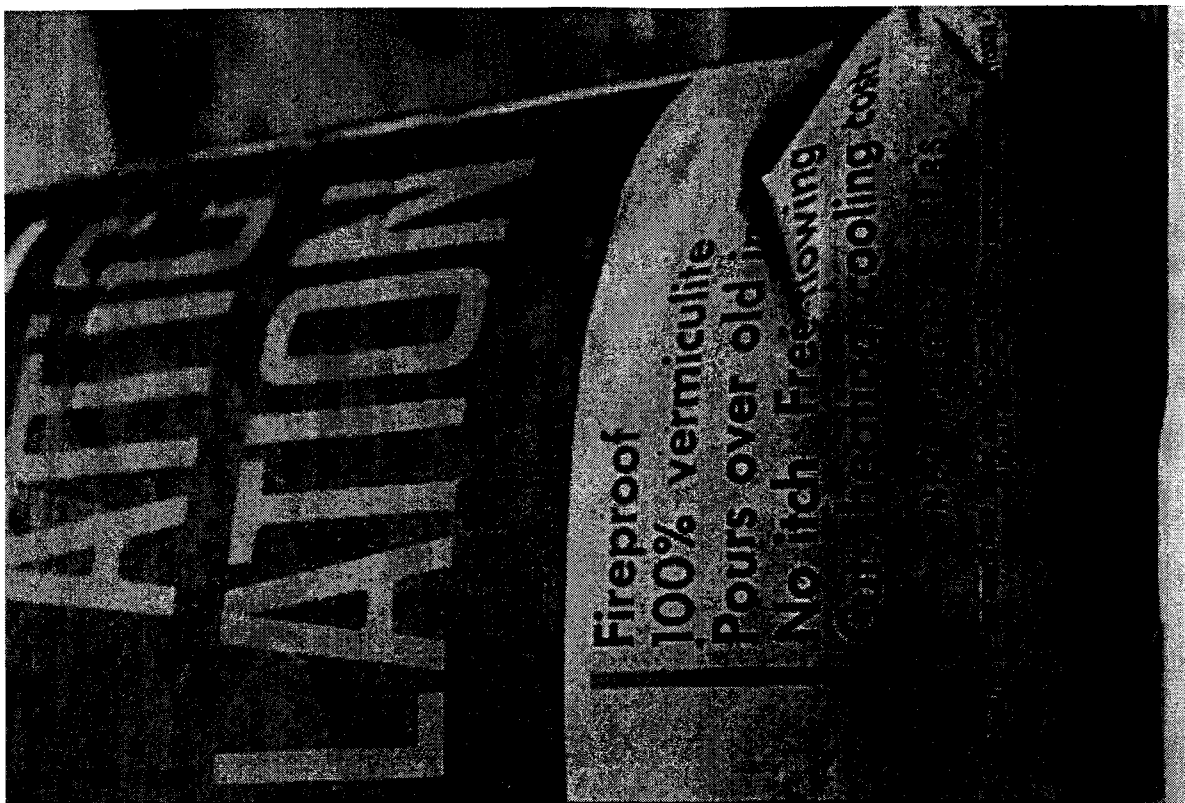
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EXHIBIT B

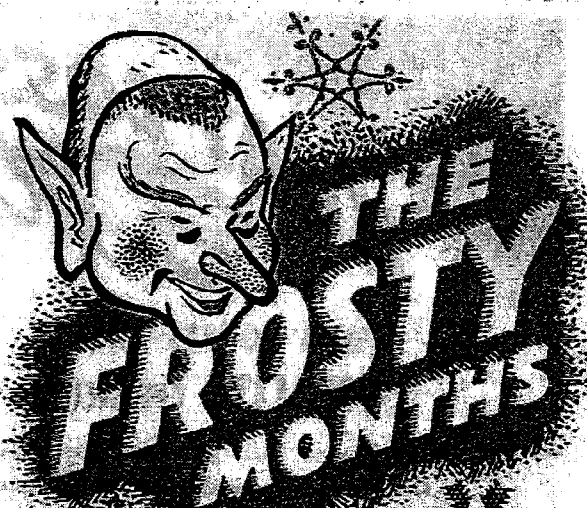




A FEW OF THE MANY REASONS WHY MORE PEOPLE ARE USING



1. **LOW INSTALLATION COST** . . . A minimum of time is needed to apply Zonolite Insulation. You just pour into place.
2. **CONSTANT FUEL SAVING** . . . Zonolite's lasting insulating properties assure low fuel and power bills year after year. Pays for its cost in 3-4 years!
3. **COMFORTABLE SUMMER AND WINTER TEMPERATURES** . . . It's easy to control temperatures when you have Zonolite in your home.
4. **FIREPROOF** . . . Zonolite is the most fire-safe material you can put into your home.
5. **SAFE** . . . Zonolite contains no harmful substance; will not irritate the skin.
6. **LIGHT BUT THICK** . . . Lightness makes for easy handling. Zonolite pours as a thick fill into every nook and corner.



**ARE COSTLY
AND LONG**

ZAI 002078

Insulate with

ZONOLITE

EVERLASTING

HEAT LOSS is Extravagance

ZAI 002079

extravagance, a. excess in anything, especially expenditure; extravagant, adj. exceeding reasonable limits; wasteful; prodigal; irregular; needlessly lavish
WEBSTER

TWIN HOUSES PROVE ZONOLITE EFFICIENCY

Twin houses built in Detroit by Albert Kahn, famous architect . . . identical except . . . House A was not insulated, while House B was completely insulated in ceiling and side walls with Zonolite brand vermiculite Insulating Fill.

Throughout one winter, both homes were kept at a constant temperature of 74°. But . . . House A used almost twice as much fuel as House B! At today's fuel costs, House B would have saved \$119.75 every year!

Over the entire heating season, records showed that Zonolite Insulation saved, on the average, 38% of the fuel bill every month, with the fluctuations never more than 2°.



KEEP SUMMER HEAT OUT—WINTER HEAT IN—

Many people think of insulation as something that only keeps out cold. True, a good insulating job does that, but it also provides amazing relief from discomfort in hot weather. Zonolite Insulation keeps homes up to 15° cooler in summer.

BOOST COMFORT—SAVE MONEY—

Then when cold weather comes, the well insulated home is not only much easier to keep warm and cozy but—most important—it saves up to 30% or more on fuel and pays for itself in a short time. After that—your savings become actual profits!

USE THE BEST INSULATION—USE ZONOLITE!

You can install Zonolite Insulation yourself in a few hours, and know you have complete insulation. It's permanent as the earth itself, the most fireproof material there is . . . and it can't rot! Big 4 cubic foot bag weighs only 20 lbs.

Thickness	2"	3"	3½"	4"	5"	5½"
Coverage per bag in sq. ft.	26	17	14	13	10½	9

These Results Prove ZONOLITE'S Insulating Efficiency

**It's 100%
FIREPROOF
too!**

ZONOLITE CAN'T BURN!

It's all mineral

—completely fireproof.

In fact it actually snuffs
out flame. Get this extra
benefit when you insulate
with Zonolite.



APPROXIMATE COVERAGE PER BAG

Thickness	2"	3"	3½"	4"	5"	5½"
Sq. Ft.	26	17	14	13	10½	9

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**START NOW . . . PUTTING MORE
BUCKS IN THE BANK**



ZAI-002090

40%

ZONOLITE



Did he say
**BUCKS IN THE
BANK?**

THANKS TO THE
4 HOUR MIRACLE
OF

ZONOLITE

Now you can Insulate Your Home
in LESS Time — for LESS Money and

**CUT YOUR FUEL BILLS
25%-33% EVEN 40%**

IT'S TRUE. In one afternoon you can insulate your home — with Zonolite vermiculite, the miracle insulating mineral that pours into place between attic joists or sidewall studs. You'll start *putting bucks in the bank* immediately... first by saving up to \$100.00 on installation costs! Then, you'll save as much as 40% every month — all winter long on fuel bills. In addition, Zonolite insulation adds to the value of your home. No matter how you figure it, you start putting bucks in the bank when you insulate with Zonolite.

ZAI 002091

**That's Right—
You'll have MORE
BUCKS IN THE
BANK!**



Do It Yourself

You can insulate the average attic with Zonolite for as little as \$67.60. Just open a lightweight bag of Zonolite. Just pour it, level it, leave it. No cutting to size; no nailing. Zonolite is rotproof, verminproof, permanent! Will outlast the life of any home. Provides greater comfort — summer and winter. Come in and see us today and get a free estimate on how inexpensively you can Zonolite-insulate your home.

**AS LOW AS
\$67.60
COST FOR
AVERAGE ATTIC**